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Satterfield, Kevin

From: Chris Cole [Chris.Cole@icba.org]
Sent: Thursday, November 30, 2006 2:59 PM
To: regs.comments@ots.treas.gov; Regs.Comments; comments@fdic.gov
Subject: Revised Letter Requesting an Extension of Comment Periods for Risk-Based Capital Standards: Advanced Capital Adequacy Standards and Market Risk; 12 CFR Part 325
Attachments: Letter to Banking Agencies Requesting Extension for Basel II Proposal.doc

Attached is a revised letter from Independent Community Bankers of America requesting an extension of the comment period for the proposed Risk-Based Capital Adequacy and Market Risk Frameworks, known as Basel II. Please substitute the attached revised letter for the letter I filed late yesterday. The revised letter corrects a date that was stated in the last paragraph which should be "March 26, 2007" rather than "March 26, 2006." Thanks.

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ICBA: The Nation's Leading Voice for Community Banks

12/1/2006



INDEPENDENT COMMUNITY BANKERS of AMERICA

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CAMDEN R. FINE
President and CEO

November 29, 2006

Office of the Comptroller of the Currency
250 E Street, SW
Mailstop 1-5
Washington, DC 20219
Docket Nos. 06-09 and 06-10

Jennifer J. Johnson, Secretary
Board of Governors of the
Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551
Docket Nos. R-1261 and R-1265

Robert E. Feldman, Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429
Attention: Comments
RIN 3064-AC73 and 3064-AD10

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552
Attn: Nos. 2006-33 and 2006-34

Re: Risk-Based Capital Standards: Advanced Capital Adequacy Framework
71 FR 55830 (September 25, 2006)
Risk-Based Capital Standards: Market Risk
71 FR 55958 (September 25, 2006)

Dear Sir or Madam:

The Independent Community Bankers of America (ICBA)¹ requests that the banking agencies extend the comment periods on the proposed Advanced Capital Adequacy and Market Risk Frameworks, known as Basel II, for at least 60 days or until March 26,

¹The Independent Community Bankers of America represents the largest constituency of community banks of all sizes and charter types in the nation, and is dedicated exclusively to representing the interests of the community banking industry. ICBA aggregates the power of its members to provide a voice for community banking interests in Washington, resources to enhance community bank education and marketability, and profitability options to help community banks compete in an ever-changing marketplace.

With nearly 5,000 members, representing more than 17,000 locations nationwide and employing over 260,000 Americans, ICBA members hold more than \$631 billion in insured deposits, \$778 billion in assets and more than \$493 billion in loans to consumers, small businesses and the agricultural community. For more information, visit ICBA's website at www.icba.org.

2007. The proposals were originally published in the Federal Register on September 25, 2006, with comments due on January 23, 2007.

ICBA believes that it is important that the agencies allow a significant overlap in comment periods between the Basel II proposal and the proposal to amend Basel I, or the Basel IA proposal. A substantial overlap is necessary to give community banks the opportunity to assess the competitive effects of both proposals and see if Basel IA will adequately mitigate any possible adverse effects of a bifurcated capital system. Also due to the complexity of both proposals, bankers need a significant amount of time to understand and compare them. In addition, community banks will want to simultaneously study both proposals to determine the impact on their own institutions.

Assuming that the Basel IA proposal is issued in early December, ICBA does not believe that a month and a half, particularly over the Christmas and New Year holiday period, allows sufficient time for banks to adequately assess the impact of both proposals simultaneously. Therefore, we request that the comment period for Basel II be extended for at least another 60 days, or until March 26, 2007.

Thank you for your consideration of this request.

Sincerely,



Karen M. Thomas
Executive Vice President
Director, Government Relations Group